SUPREME COURT, U. S.
Supreme Court, U.S.
FILED
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E. ROBERT SEAVER, CLERK

IN THE

Supreme Court of the United States

October Term, 1970

No. 980

PIER 67, INC. a/k/a
EDGEWATER INN,

Petitioner,

v.

KING COUNTY, a municipal Corporation;
A. J. STEEN as Assessor for King
County; and A. A. TREMPER as
Treasurer for King County,
Washington,

Respondent.

BRIEF IN OPPOSITION TO CERTIORARI

CHARLES O. CARROLL
Prosecuting Attorney
By WILLIAM L. PAUL, JR.
Assistant Chief Civil Deputy
Counsel for Respondent

Office Address:
W558 King County Courthouse
Seattle, Washington 98104

FRAYN PRINTING COMPANY SEATTLE, WASHINGTON

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TABLE OF CONTENTS

	Page
NO FEDERAL QUESTION CLAIMED	1
THERE IS NO SUBSTANTIAL FEDERAL QUESTION	2

TABLE OF CASES

Michel v. Louisiana, 350 U.S. 91, 93 2

Nostrand v. Little, (1961) 58 Wn.2d 111, 120, 361 P.2d 551 2

Rice v. Sioux City Memorial Park Cemetary, 349 U.S. 70, 74 (1955) 2

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BRIEF IN OPPOSITION TO CERTIORARI

Respondent, King County, makes its brief in Opposition to the Petition for Certiorari to the Supreme Court of the State of Washington.

NO FEDERAL QUESTION CLAIMED

Petitioner's brief (R.0144) had no federal title, right, privilege, or immunity specially set up or claimed in the State's

Supreme Court. *Michel v. Louisiana*, 350 U.S. 91, 93.

Federal questions now raised by petitioner were raised first on the Petition for Rehearing (R.0177). Our State's Supreme Court will not consider questions presented to it for the first time in a Petition for Rehearing. *Nostrand v. Little*, (1961) 58 Wn.2d 111, 120, 361 P.2d 551.

THERE IS NO SUBSTANTIAL FEDERAL QUESTION

There are no special and important reasons stated in the petition for the court to take jurisdiction other than the episode concerning this petitioner. The State's Supreme Court was merely correcting erroneous decisions that it had made in 1911, 1912, 1913 and 1927 involving a single property owner, Metropolitan Building Company. *Rice v. Sioux City Memorial Park Cemetary*, 349 U.S. 70, 74 (1955).

The Petition ought to be denied.

Respectfully submitted,

WILLIAM L. PAUL, JR.
Assistant Chief Civil Deputy Prosecuting Attorney
for King County, Washington

CHARLES O. CARROLL
Prosecuting Attorney for King County
WILLIAM L. PAUL, JR.
Assistant Chief Civil Deputy